

Exhibit 2

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

-----x

4 THE SOUTH CAROLINA STATE
5 CONFERENCE OF THE NAACP

6 and

7 TAIWAN SCOTT, ON BEHALF OF HIMSELF
8 AND ALL OTHER SIMILARLY SITUATED
PERSONS,

Case No.
3:21-CV-03302
JMC-TJH-RMG

9 Plaintiffs,

10 Vs.

11 THOMAS C. ALEXANDER, IN HIS OFFICIAL
12 CAPACITY AS PRESIDENT OF THE SENATE;
13 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY
14 AS CHAIRMAN OF THE SENATE JUDICIARY
15 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL
16 CAPACITY AS SPEAKER OF THE HOUSE OF
17 REPRESENTATIVES; CHRIS MURPHY, IN HIS
18 OFFICIAL CAPACITY AS CHAIRMAN OF THE
19 HOUSE OF REPRESENTATIVES JUDICIARY
20 COMMITTEE; WALLACE H. JORDAN, IN HIS
21 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE
OF REPRESENTATIVES ELECTIONS LAW
SUBCOMMITTEE; HOWARD KNAPP, IN HIS
OFFICIAL CAPACITY AS INTERIM EXECUTIVE
DIRECTOR OF THE SOUTH CAROLINA STATE
ELECTION COMMISSION; JOHN WELLS, JOANNE
DAY, CLIFFORD J. EDLER, LINDA MCCALL,
AND SCOTT MOSELEY, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE SOUTH
CAROLINA STATE ELECTION COMMISSION,

Defendants.

-----x

22
23 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION
CHARLES TERRENI
24 Tuesday, August 16, 2022
25

<p style="text-align: right;">Page 2</p> <p>1 2 August 16, 2022 3 9:56 a.m. 4 5 6 T R A N S C R I P T of the 7 stenographic remote virtual deposition 8 of CHARLES TERRENI, pursuant to the 9 Federal Rules of Civil Procedure, held 10 remotely on Tuesday, August 16, 2022, 11 commencing at approximately 9:56 a.m. 12 (EST), reported by and before Erica 13 Ruggieri, a Registered Professional 14 Reporter, Certified Court Reporter, 15 and Notary Public of the State of New 16 York and New York. 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 2 APPEARANCES OF COUNSEL: (Cont'd) 3 (Via Videoconference) 4 5 ATTORNEYS FOR THOMAS C. ALEXANDER, IN HIS 6 OFFICIAL CAPACITY AS PRESIDENT OF THE 7 SENATE; IJUE A. RANKIN, IN HIS OFFICIAL 8 CAPACITY AS CHAIRMAN OF THE SENATE 9 JUDICIARY COMMITTEE; 10 ROBINSON GRAY STEPP & LAFFITTE, LLC 11 BY: VORDMAN CARLISLE TRAYWICK III, ESQ. 12 1310 Gadsden Street 13 PO Box 11449 14 Columbia, SC 29211 15 (803) 231-7810 16 ltraywick@robinsongray.com 17 18 ATTORNEYS FOR ELECTION DEFENDANTS: 19 BURR & FORMAN, LLP 20 BY: JANE W. TRINKLEY, ESQ. 21 1221 Main Street, Suite 1800 22 Columbia, South Carolina 29201 23 803-799-9800 24 jtrinkley@burr.com 25</p>
<p style="text-align: right;">Page 3</p> <p>1 2 APPEARANCES OF COUNSEL: 3 (Via Videoconference) 4 5 ATTORNEYS FOR THE PLAINTIFFS: 6 THE SOUTH CAROLINA STATE CONFERENCE OF 7 THE NAACP AND MOON DUCHIN, PHD: 8 NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC. 9 BY: LEAH C. ADEN, ESQ. 10 JOHN CUSICK, ESQ. 11 40 Rector Street, Fifth Floor 12 New York, New York 10006 13 (917) 858-2870 14 laden@naacpldf.com 15 jcusick@naacpldf.org 16 17 ATTORNEYS FOR THE HOUSE DEFENDANTS: 18 NEXSEN PRUET, LLC 19 BY: ANDREW MATHIAS, ESQ. 20 104 South Main Street, Suite 900 21 Greenville, South Carolina 29601 22 (864) 370-2211 23 amathias@nexsenpruet.com 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 2 APPEARANCES OF COUNSEL: (Cont'd) 3 (Via Videoconference) 4 5 ATTORNEYS FOR SENATE DEFENDANTS: 6 ARNOLD & PORTER 7 BY: JOHN GORE, ESQ. 8 601 Massachusetts Ave NW 9 Washington DC 20001 10 (202) 942-5796 11 john.gore@arnoldporter.com 12 -and- 13 ROBINSON GRAY STEPP & LAFFITTE, LLC 14 BY: CYNTHIA NYGORD, ESQ. 15 1310 Gadsden Street 16 PO Box 11449 17 Columbia, South Carolina 29211 18 (803) 231-7810 19 cnygord@robinsongray.com 20 21 22 23 24 25</p>

<p style="text-align: right;">Page 6</p> <p>1 TERRENI</p> <p>2 C H A R L E S T E R R E N I,</p> <p>3 called as a witness, having been</p> <p>4 duly sworn by a Notary Public, was</p> <p>5 examined and testified as follows:</p> <p>6 EXAMINATION BY</p> <p>7 MS. ADEN:</p> <p>8 Q. Good morning, Mr. Terreni.</p> <p>9 I am Leah Aden. It's nice to see</p> <p>10 you.</p> <p>11 A. Nice to see you again.</p> <p>12 Q. I am currently, as you may</p> <p>13 know, representing Plaintiffs in the</p> <p>14 current challenge to certain</p> <p>15 congressional districts and</p> <p>16 Plaintiffs are the South Carolina</p> <p>17 NAACP and Mr. Tai Scott.</p> <p>18 Do you mind going ahead and</p> <p>19 stating your name and spelling it</p> <p>20 for the record, please?</p> <p>21 A. Certainly. It's Charles,</p> <p>22 C-H-A-R-L-E-S. Terreni,</p> <p>23 T-E-R-R-E-N-I.</p> <p>24 Q. So the correct</p> <p>25 pronunciation is Terreni?</p>	<p style="text-align: right;">Page 8</p> <p>1 TERRENI</p> <p>2 for your knowledge, Mr. Terreni,</p> <p>3 that Ms. Nygord is on the staff</p> <p>4 team for one of the plaintiff</p> <p>5 counsel, I believe the Senate</p> <p>6 defendant team. You may be</p> <p>7 familiar but just so you know who</p> <p>8 is on the line and I believe that</p> <p>9 is everyone.</p> <p>10 Q. Mr. Terreni, you are a</p> <p>11 lawyer; is that correct?</p> <p>12 A. Yes, ma'am.</p> <p>13 Q. But you are represented</p> <p>14 here today. Is that also correct?</p> <p>15 A. It is.</p> <p>16 Q. And who represents you?</p> <p>17 A. John Gore and Lisle</p> <p>18 Traywick.</p> <p>19 Q. And they are with the Jones</p> <p>20 Day law firm?</p> <p>21 A. John Gore is with the Jones</p> <p>22 Day law firm. Lisle Traywick is</p> <p>23 with, they changed their name</p> <p>24 recently, maybe he will refresh my</p> <p>25 memory. Robinson Gray.</p>
<p style="text-align: right;">Page 7</p> <p>1 TERRENI</p> <p>2 A. That's fine.</p> <p>3 MS. ADEN: And I'd like to</p> <p>4 take a moment and ask everyone who</p> <p>5 is representing parties in the case</p> <p>6 to also go ahead and state their</p> <p>7 name for the record beginning with</p> <p>8 counsel for the plaintiffs.</p> <p>9 MR. CUSICK: Good morning.</p> <p>10 This is John Cusick also with LDF</p> <p>11 on behalf of the Plaintiffs.</p> <p>12 MS. ADEN: Mr. Gore, would you</p> <p>13 go next, please.</p> <p>14 MR. GORE: Sure. John Gore</p> <p>15 for the Senate Defendants.</p> <p>16 MR. TRAYWICK: Lisle Traywick</p> <p>17 of Robinson Gray also for the</p> <p>18 Senate Defendants.</p> <p>19 MS. TRINKLEY: Jane Trinkley</p> <p>20 with Burr & Forman for the Election</p> <p>21 Defendants.</p> <p>22 MR. MATHIS: Andrew Mathias of</p> <p>23 Nexsen Pruet for the individual</p> <p>24 House Defendants.</p> <p>25 MS. ADEN: And I believe just</p>	<p style="text-align: right;">Page 9</p> <p>1 TERRENI</p> <p>2 Q. Gray?</p> <p>3 A. Yeah.</p> <p>4 Q. Have you taken depositions</p> <p>5 before?</p> <p>6 A. Yes.</p> <p>7 Q. About how many times?</p> <p>8 A. Couple dozen at least.</p> <p>9 Q. So just so that we are on</p> <p>10 the same page despite your having</p> <p>11 taken depositions before, I'm going</p> <p>12 to identify some basic ground rules</p> <p>13 for how this deposition will proceed</p> <p>14 today so we are on the same page.</p> <p>15 You have been sworn in so you</p> <p>16 are testifying under oath which</p> <p>17 means that you are testifying as if</p> <p>18 you are before a judge in a</p> <p>19 courtroom with the same duty to</p> <p>20 answer questions truthfully.</p> <p>21 Do you understand?</p> <p>22 A. Yes.</p> <p>23 Q. And a court reporter,</p> <p>24 Ms. Ruggieri, whose name I may</p> <p>25 already mispronounced already is</p>

3 (Pages 6 - 9)

<p style="text-align: right;">Page 162</p> <p>1 TERRENI</p> <p>2 A. Yeah, it is.</p> <p>3 Q. So with respect to many of</p> <p>4 these that we just described it's a</p> <p>5 factual question whether or not they</p> <p>6 are split or not split, whole or not</p> <p>7 split whole and your view --</p> <p>8 Yes, I'm sorry?</p> <p>9 A. No, I was nodding along,</p> <p>10 sorry, go ahead.</p> <p>11 Q. And then it becomes a legal</p> <p>12 question in your view about whether</p> <p>13 or not that split or that keeping of</p> <p>14 a district as similar, you know, the</p> <p>15 amount of how a district retains or</p> <p>16 is not -- or is different from a</p> <p>17 benchmark plan the degree to whether</p> <p>18 or not that happens or if that</p> <p>19 happens is a legal question in your</p> <p>20 view or whether it's appropriate for</p> <p>21 it to split or not split, whether</p> <p>22 it's appropriate to retain this much</p> <p>23 or that little, for you that's a</p> <p>24 legal question of how the courts</p> <p>25 will view those decisions?</p>	<p style="text-align: right;">Page 164</p> <p>1 TERRENI</p> <p>2 might have done an analysis of how</p> <p>3 many splits there were of a</p> <p>4 particular county or city, and you</p> <p>5 might have both shared that data</p> <p>6 with Jones Day and asked whether or</p> <p>7 not that is defensible, both of</p> <p>8 those could have been done in the</p> <p>9 context of your communications with</p> <p>10 Jones Day?</p> <p>11 MR. GORE: I'm just going to</p> <p>12 put an objection on the record. We</p> <p>13 are getting really close to topics</p> <p>14 and conversations that may have</p> <p>15 been covered by attorney-client</p> <p>16 privilege. So if the witness can</p> <p>17 answer that without divulging</p> <p>18 privileged conversations, he can do</p> <p>19 so.</p> <p>20 A. I'm sorry, can you repeat</p> <p>21 that question?</p> <p>22 Q. Yes. Would you have on</p> <p>23 behalf of the Senate have asked</p> <p>24 Jones Day or have shared with Jones</p> <p>25 Day factual information about the</p>
<p style="text-align: right;">Page 163</p> <p>1 TERRENI</p> <p>2 A. Yes.</p> <p>3 MR. GORE: Object to form.</p> <p>4 You can answer.</p> <p>5 A. Thank you. The</p> <p>6 appropriateness or the legality, the</p> <p>7 defensibility of one feature or</p> <p>8 another of the plan would be core</p> <p>9 constituency splitting counties, the</p> <p>10 circumstances under which it's done,</p> <p>11 the reasons for it, I think those</p> <p>12 are legal questions, at least in the</p> <p>13 context that they were posed to</p> <p>14 Mr. Gore.</p> <p>15 The fact that a plan splits a</p> <p>16 county five times that's sort of a</p> <p>17 factual issue that's generated on</p> <p>18 Maptitude before. So are these</p> <p>19 concepts like communities of</p> <p>20 interest, I think they are a little</p> <p>21 hazier, but I think it's safe to say</p> <p>22 I didn't rely on Mr. Gore for his</p> <p>23 knowledge of South Carolina.</p> <p>24 Q. But you might ask -- you</p> <p>25 might -- is it fair to say that you</p>	<p style="text-align: right;">Page 165</p> <p>1 TERRENI</p> <p>2 number of splits in a particular</p> <p>3 plan?</p> <p>4 A. Yeah.</p> <p>5 Q. Would you have asked Jones</p> <p>6 Day to confirm whether those numbers</p> <p>7 that you shared were accurate or</p> <p>8 not?</p> <p>9 A. No.</p> <p>10 Q. You would -- would you have</p> <p>11 expected that they would have</p> <p>12 checked the accuracy of data that</p> <p>13 you shared with them?</p> <p>14 A. No.</p> <p>15 Q. But you would have asked</p> <p>16 them whether or not that number of</p> <p>17 splits is defensible or not, is that</p> <p>18 fair to say?</p> <p>19 A. I could have, yeah. I</p> <p>20 could have. I mean I -- when it</p> <p>21 comes to a number of splits I mean</p> <p>22 we had Maptitude and Will Roberts</p> <p>23 for that. I didn't need John Gore</p> <p>24 for that. You know, the Senate plan</p> <p>25 with various attributes and I'd say</p>

<p style="text-align: right;">Page 166</p> <p>1 TERRENI</p> <p>2 the question generally was give us</p> <p>3 your legal opinion whether this plan</p> <p>4 complies with redistricting law and</p> <p>5 whether it will be defensible in</p> <p>6 litigation.</p> <p>7 Q. Just to be clear, any of</p> <p>8 the plans that you would have sent</p> <p>9 to Jones Day would have included</p> <p>10 statistical data that captured some</p> <p>11 racial demographics?</p> <p>12 A. No. It could have. It</p> <p>13 didn't necessarily. It's possible.</p> <p>14 Often do. But not -- we wouldn't</p> <p>15 have mandate. It wasn't pertinent</p> <p>16 to the question so we probably</p> <p>17 wouldn't have sent it. I don't</p> <p>18 know.</p> <p>19 Q. Looking back at this</p> <p>20 retainer letter.</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. How would you have</p> <p>23 communicated or reported to Chairman</p> <p>24 Rankin, by phone, by text, by email</p> <p>25 or combination thereof?</p>	<p style="text-align: right;">Page 168</p> <p>1 TERRENI</p> <p>2 Q. Who did you send the bill</p> <p>3 to?</p> <p>4 A. The bill goes to Andy</p> <p>5 Fiffick and the Senate clerk.</p> <p>6 Q. Is it fair to say that</p> <p>7 based upon this retainer you bill on</p> <p>8 a monthly basis?</p> <p>9 A. I generally do, yes.</p> <p>10 Q. Okay. Do you know the</p> <p>11 source of those funds?</p> <p>12 A. The State of South</p> <p>13 Carolina.</p> <p>14 Q. And this is, reflects a</p> <p>15 retainer from December 30, 2019, is</p> <p>16 that fair to say? At the top of</p> <p>17 South Carolina Senate?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. 4353, it's dated</p> <p>20 December 30, 2019?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Do you know approximately</p> <p>23 how much you have billed for your</p> <p>24 work on redistricting under this</p> <p>25 retainer since December 30, 2019?</p>
<p style="text-align: right;">Page 167</p> <p>1 TERRENI</p> <p>2 A. Combination. And in</p> <p>3 person.</p> <p>4 Q. Are you still employed by</p> <p>5 the Senate?</p> <p>6 A. I never was employed by the</p> <p>7 Senate unless you count my time as a</p> <p>8 Senate page. I'm under contract.</p> <p>9 Is the Senate paying my bills now,</p> <p>10 yeah.</p> <p>11 Q. Are you still -- is this</p> <p>12 retainer agreement still in effect</p> <p>13 with respect to your work with the</p> <p>14 Senate?</p> <p>15 A. Yes.</p> <p>16 Q. Looking at the second</p> <p>17 paragraph it reflects your hourly</p> <p>18 rate?</p> <p>19 A. Yes.</p> <p>20 Q. And shares the process by</p> <p>21 which you will bill for your work on</p> <p>22 behalf of the Senate. Who do you</p> <p>23 bill?</p> <p>24 A. The Senate. I mean</p> <p>25 specifically?</p>	<p style="text-align: right;">Page 169</p> <p>1 TERRENI</p> <p>2 A. No, ma'am.</p> <p>3 Q. Would it be fair to say</p> <p>4 that you have at least attempted to</p> <p>5 on a monthly basis provide bills to</p> <p>6 the Senate, Andy Fiffick or someone</p> <p>7 else, on a monthly basis since</p> <p>8 December 30, 2019?</p> <p>9 A. Generally speaking. If</p> <p>10 there was a month without a lot of</p> <p>11 work I might have held the bill</p> <p>12 until the next month, but we</p> <p>13 generally bill monthly.</p> <p>14 Q. Do you know whether your</p> <p>15 monthly bills, would they range in</p> <p>16 amount of \$5,000, \$10,000, \$20,000?</p> <p>17 A. It would vary. I mean back</p> <p>18 in 2019 they might have been very</p> <p>19 small. During -- after the PL data</p> <p>20 came out they would have been</p> <p>21 substantially more because I was</p> <p>22 spending more time. I don't really</p> <p>23 -- I mean -- that's my answer. I</p> <p>24 don't know.</p> <p>25 Q. Between November and</p>

<p style="text-align: right;">Page 178</p> <p>1 TERRENI</p> <p>2 aware, was there any vote to deviate</p> <p>3 from these guidelines during this</p> <p>4 past redistricting cycle?</p> <p>5 A. Not that I'm aware of.</p> <p>6 Q. Based upon the stated</p> <p>7 purpose would you agree that the</p> <p>8 public would reasonably look to this</p> <p>9 document to understand the criteria,</p> <p>10 the guidelines, the Senate would be</p> <p>11 perhaps identified as useful to</p> <p>12 developing proposals by the</p> <p>13 legislature?</p> <p>14 A. Yeah.</p> <p>15 Q. And to evaluate the map</p> <p>16 ultimately enacted by the</p> <p>17 legislature?</p> <p>18 A. They would be one -- there</p> <p>19 would be one measure. I mean a</p> <p>20 number of people submitted very</p> <p>21 different policy proposals that they</p> <p>22 asserted complied with the</p> <p>23 guidelines. And certainly with the</p> <p>24 more objective measures such as plus</p> <p>25 or minus one and that kind of thing.</p>	<p style="text-align: right;">Page 180</p> <p>1 TERRENI</p> <p>2 our community. It's Bates stamped</p> <p>3 South Carolina Senate 3745.</p> <p>4 A. Um-hmm.</p> <p>5 Q. Have you found that</p> <p>6 document?</p> <p>7 A. I have.</p> <p>8 (Plaintiffs' Exhibit 10, South</p> <p>9 Carolina Senate Redistricting</p> <p>10 Subcommittee 2021 Public Hearings,</p> <p>11 Bates South Carolina Senate 3745,</p> <p>12 marked for identification, as of</p> <p>13 this date.)</p> <p>14 Q. Do you recognize this</p> <p>15 document?</p> <p>16 A. Yes.</p> <p>17 Q. Did you help create it?</p> <p>18 A. I may have.</p> <p>19 Q. Can you read into the</p> <p>20 record the first two sentences under</p> <p>21 Redistricting Guidelines beginning</p> <p>22 with "Redistricting guidelines or</p> <p>23 criteria"?</p> <p>24 A. Yes. "Redistricting</p> <p>25 guidelines or criteria are the rules</p>
<p style="text-align: right;">Page 179</p> <p>1 TERRENI</p> <p>2 They did. I mean but they were very</p> <p>3 different. I mean so I'm not</p> <p>4 sure -- yes, the public would look</p> <p>5 to these guidelines but then express</p> <p>6 their policy differences through the</p> <p>7 guidelines. In other words, they</p> <p>8 might say well, no, I think my map,</p> <p>9 which is, complies with the</p> <p>10 guidelines, is a threshold matter is</p> <p>11 a better policy choice than somebody</p> <p>12 else's map just as you did versus</p> <p>13 other maps that were for your</p> <p>14 organization versus other maps that</p> <p>15 were submitted.</p> <p>16 Q. Did you or the Senate</p> <p>17 present the guidelines to the public</p> <p>18 as rules for how the maps would be</p> <p>19 judged?</p> <p>20 A. I don't recall using that</p> <p>21 language, no.</p> <p>22 Q. Let's look at tab 49, which</p> <p>23 is a document titled South Carolina</p> <p>24 Senate Redistricting Subcommittee</p> <p>25 2021 Public Hearings. Tell us about</p>	<p style="text-align: right;">Page 181</p> <p>1 TERRENI</p> <p>2 of the road for how district lines</p> <p>3 are redrawn in accordance with</p> <p>4 state's population. Criteria is</p> <p>5 intended to make the districts easy</p> <p>6 to identify and understand and to</p> <p>7 ensure fairness and consistency."</p> <p>8 Q. So based upon this document</p> <p>9 do you have any reason to disagree</p> <p>10 that this document was publicized by</p> <p>11 the Senate Judiciary Redistricting</p> <p>12 Subcommittee during this last round</p> <p>13 of redistricting?</p> <p>14 A. No.</p> <p>15 Q. And is it fair to say that</p> <p>16 this document that was publicized</p> <p>17 identified the redistricting</p> <p>18 guidelines as rules of the road for</p> <p>19 how lines will be redrawn?</p> <p>20 A. Yeah. The rules of the</p> <p>21 road for how lines would be drawn,</p> <p>22 they are not the exclusive criteria</p> <p>23 for how lines will be judged and I</p> <p>24 feel confident everybody understood</p> <p>25 that because they submitted vastly</p>

46 (Pages 178 - 181)

<p style="text-align: right;">Page 294</p> <p>1 TERRENI</p> <p>2 Q. Did Adam Kincaid see this</p> <p>3 initial staff plan before it was</p> <p>4 publicized?</p> <p>5 A. No.</p> <p>6 Q. Did Reagen Kelly see this</p> <p>7 initial staff plan before it was</p> <p>8 publicized?</p> <p>9 A. I'm almost certain he did</p> <p>10 not because Reagan really expressed</p> <p>11 at the beginning of the</p> <p>12 congressional process that he</p> <p>13 wanted -- he really didn't want</p> <p>14 anything to do with it.</p> <p>15 Q. He really didn't want to</p> <p>16 what?</p> <p>17 A. That he wasn't going to be</p> <p>18 involved in the congressional</p> <p>19 process. The only hedging I'm</p> <p>20 getting is Reagan, certainly if</p> <p>21 Reagan had walked in the room we</p> <p>22 wouldn't -- knocked on the door and</p> <p>23 wanted to come in we wouldn't have</p> <p>24 turned him away, but I don't recall</p> <p>25 him seeing it and I don't believe he</p>	<p style="text-align: right;">Page 296</p> <p>1 TERRENI</p> <p>2 A. I believe so, yes.</p> <p>3 Q. But Jasper County is a</p> <p>4 considered part of the black belt in</p> <p>5 South Carolina?</p> <p>6 A. Jasper County is a</p> <p>7 significant African-American</p> <p>8 population. I don't recall its</p> <p>9 present demographics. There's been</p> <p>10 a lot of spread out in Hilton Head</p> <p>11 so I don't want to qualify that.</p> <p>12 But generally speaking, yes, it</p> <p>13 would be -- it would have a larger</p> <p>14 African-American population than Sun</p> <p>15 City, that's for sure.</p> <p>16 Q. Do you know whether at any</p> <p>17 point in developing the initial</p> <p>18 staff plan or frankly any point</p> <p>19 while the Senate was considering</p> <p>20 congressional redistricting whether</p> <p>21 anyone attempted to draw a Second</p> <p>22 District in which black voters were</p> <p>23 the majority of the district?</p> <p>24 A. From the Senate staff or</p> <p>25 the public submissions?</p>
<p style="text-align: right;">Page 295</p> <p>1 TERRENI</p> <p>2 did.</p> <p>3 Q. As the initial staff plan</p> <p>4 was being developed, how was -- are</p> <p>5 you aware of how Will Roberts or any</p> <p>6 other Senate staffer was factoring</p> <p>7 in the information received during</p> <p>8 the public comment period?</p> <p>9 A. Oh, he was there. He heard</p> <p>10 it. He would have distilled it.</p> <p>11 There were little details. You</p> <p>12 know, an example that we all thought</p> <p>13 of was there were members of Sun</p> <p>14 City in Jasper County who expressed</p> <p>15 a strong preference for remaining in</p> <p>16 the same district with the remainder</p> <p>17 of Sun City, which was largely</p> <p>18 Beaufort County. So you'll see that</p> <p>19 little protrusion in Jasper. That</p> <p>20 was the result of public testimony.</p> <p>21 So some of these features would be</p> <p>22 absorbed in that way.</p> <p>23 Q. Did Sun -- are the</p> <p>24 demographics of Sun City largely</p> <p>25 majority white?</p>	<p style="text-align: right;">Page 297</p> <p>1 TERRENI</p> <p>2 Q. Senate staff.</p> <p>3 A. I don't believe anyone</p> <p>4 purposefully set up to draw a black</p> <p>5 majority District 6. I don't recall</p> <p>6 if anyone drew a map in the course</p> <p>7 of map drawing that was black</p> <p>8 majority. That might not have been</p> <p>9 the goal as far as I'm aware.</p> <p>10 Q. My question I think was a</p> <p>11 little bit different. But whether</p> <p>12 outside of CD 6 whether anyone --</p> <p>13 let's stop for a second. CD 6 prior</p> <p>14 to this enacted map was a district</p> <p>15 above 50 percent majority of black</p> <p>16 voters under some measure of black</p> <p>17 that the census provides?</p> <p>18 A. Under the 2010 census that</p> <p>19 certainly is the case. I don't</p> <p>20 recall, Ms. Aden, if CD 6 was</p> <p>21 majority black under the PL data</p> <p>22 that was released. In other words,</p> <p>23 prior CD 6 I don't know if there was</p> <p>24 a majority district or at least a</p> <p>25 BVAP majority district under the PL</p>

75 (Pages 294 - 297)

<p style="text-align: right;">Page 334</p> <p>1 TERRENI</p> <p>2 preferences of and various features</p> <p>3 of the map. Features of the map</p> <p>4 that were inherited from the court.</p> <p>5 Q. Like with the initial staff</p> <p>6 map do you know whether Senate</p> <p>7 Amendment 1 was shared with Jones</p> <p>8 Day before it was released to the</p> <p>9 public?</p> <p>10 A. Senate Amendment 1?</p> <p>11 Q. Um-hmm.</p> <p>12 A. Probably. Most likely.</p> <p>13 Q. Can you describe briefly</p> <p>14 the process for how the initial</p> <p>15 Senate staff plan was modified to</p> <p>16 become Senate Amendment 1?</p> <p>17 A. Well, it was replaced at a</p> <p>18 subcommittee. There was a hearing</p> <p>19 held by the subcommittee. There was</p> <p>20 public testimony on the plan,</p> <p>21 various members came and inquired</p> <p>22 about it, maybe shared concerns</p> <p>23 about it, maybe suggested things</p> <p>24 that should or shouldn't be done.</p> <p>25 And ultimately the amendment</p>	<p style="text-align: right;">Page 336</p> <p>1 TERRENI</p> <p>2 And there were some other</p> <p>3 features, like Beaufort was kept in</p> <p>4 the First District with Charleston,</p> <p>5 Berkeley or at least partially</p> <p>6 Charleston. I mean there were -- I</p> <p>7 could go on. I don't know -- you</p> <p>8 tell me.</p> <p>9 Q. Were there any other key</p> <p>10 criteria that you think guided the</p> <p>11 Senate Amendment 1?</p> <p>12 A. The criteria were the</p> <p>13 criteria. Was there any other key</p> <p>14 input that guided Senate Amendment</p> <p>15 1, there might have been. Again,</p> <p>16 I'm distinguishing between criteria</p> <p>17 as the criteria adopted by the</p> <p>18 subcommittee and political decisions</p> <p>19 that were made by the membership in</p> <p>20 the development of the map. I think</p> <p>21 those are two different things.</p> <p>22 Q. You mentioned Sun City</p> <p>23 earlier being responded to in terms</p> <p>24 of that white majority area being</p> <p>25 kept together in Jasper County?</p>
<p style="text-align: right;">Page 335</p> <p>1 TERRENI</p> <p>2 emerged. Maybe even the staff had</p> <p>3 some ideas about how we could build</p> <p>4 on it. I believe at some point we</p> <p>5 understood that Berkeley County</p> <p>6 could be kept whole, for instance,</p> <p>7 and so we did it.</p> <p>8 Q. Was that a priority to keep</p> <p>9 Berkeley whole?</p> <p>10 A. No, it wasn't a specific</p> <p>11 priority to keep Berkeley whole.</p> <p>12 No, it was just a feature.</p> <p>13 Q. What were the priorities of</p> <p>14 Senate Amendment 1 as far as you can</p> <p>15 recall?</p> <p>16 A. Well, they preserved the</p> <p>17 course of the existing districts in</p> <p>18 a way that most other plans didn't.</p> <p>19 I think for some members there was a</p> <p>20 political consideration and they at</p> <p>21 least preserved the competitive</p> <p>22 nature of District 1 and its</p> <p>23 viability for a Republican</p> <p>24 candidate. There's certainly no</p> <p>25 guarantee.</p>	<p style="text-align: right;">Page 337</p> <p>1 TERRENI</p> <p>2 A. Yes.</p> <p>3 Q. Do you, sitting here today,</p> <p>4 believe that the community in</p> <p>5 Charleston was kept whole and</p> <p>6 responded to in the same way as</p> <p>7 those in Sun City?</p> <p>8 MR. GORE: Objection.</p> <p>9 Mischaracterizes his testimony.</p> <p>10 A. Yeah, that's certainly not</p> <p>11 my testimony.</p> <p>12 Q. That's a question. Do you</p> <p>13 think that --</p> <p>14 A. I don't think they are</p> <p>15 comparable.</p> <p>16 Q. You don't think they are?</p> <p>17 A. Comparable.</p> <p>18 Q. How come?</p> <p>19 A. We are talking about a</p> <p>20 sliver of Jasper County. I don't</p> <p>21 remember the specific population but</p> <p>22 it was de minimis. It is part of</p> <p>23 the same -- as far as I know even</p> <p>24 enclosed but it's certainly the same</p> <p>25 planned community that has its bulk</p>

<p style="text-align: right;">Page 338</p> <p>1 TERRENI</p> <p>2 in Berkeley County so -- I mean</p> <p>3 Beaufort County. So it really</p> <p>4 wasn't a stretch to say we are going</p> <p>5 to take Sun City and loop in this</p> <p>6 little nub at the top of -- at the</p> <p>7 bottom of Jasper County, top of</p> <p>8 Beaufort, and keep the Sun City</p> <p>9 place together. It's only -- I</p> <p>10 don't know, but they certainly --</p> <p>11 they have the same roads, they have</p> <p>12 the same community events for its</p> <p>13 connectivity. That seemed like a</p> <p>14 fairly reasonable conclusion to</p> <p>15 reach and it was not going to have</p> <p>16 any kind of major political impact</p> <p>17 on anybody one way or the other. So</p> <p>18 we didn't see it as something that</p> <p>19 would impact the Sixth District or</p> <p>20 the First District one way or the</p> <p>21 other. It was not a big enough</p> <p>22 situation.</p> <p>23 Charleston is very different.</p> <p>24 Charleston in its current</p> <p>25 configuration, you know, at least</p>	<p style="text-align: right;">Page 340</p> <p>1 TERRENI</p> <p>2 by the people voting on the plans.</p> <p>3 It's not for me to say.</p> <p>4 MS. ADEN: Can we take a</p> <p>5 five-minute so I can streamline</p> <p>6 with the time that's remaining?</p> <p>7 THE WITNESS: Fine with me.</p> <p>8 MS. ADEN: Could we go to 5:05</p> <p>9 just to be even. That would be</p> <p>10 helpful.</p> <p>11 THE WITNESS: Sure.</p> <p>12 (Whereupon, there is a recess</p> <p>13 in the proceedings.)</p> <p>14 Q. If I can have you look at</p> <p>15 tab 5, which is a transcription of</p> <p>16 -- which is a transcription of the</p> <p>17 January 13, 2022, Senate Judiciary</p> <p>18 hearing transcribed by a court</p> <p>19 reporter service. This would be</p> <p>20 Plaintiffs' Exhibit 20. And if you</p> <p>21 could turn to page 18 in the top</p> <p>22 right-hand corner.</p> <p>23 (Plaintiffs' Exhibit 20,</p> <p>24 Transcription of 1/13/2022 Senate</p> <p>25 Judiciary hearing, marked for</p>
<p style="text-align: right;">Page 339</p> <p>1 TERRENI</p> <p>2 the beginnings of it were drawn by</p> <p>3 the United States District Court.</p> <p>4 And Charleston County, as far as I</p> <p>5 know, has never been unified in a</p> <p>6 congressional district in, certainly</p> <p>7 since single member districts maybe.</p> <p>8 I stand corrected. If we go before</p> <p>9 2000, my memory is fading a little</p> <p>10 bit.</p> <p>11 So no, I don't think there's a</p> <p>12 comparison between, given the</p> <p>13 peninsula of Charleston County in</p> <p>14 District 1, I think they are apples</p> <p>15 and oranges.</p> <p>16 Q. If Charleston could be kept</p> <p>17 whole in CD 1, comply with the</p> <p>18 Senate's stated criteria, keep CD 7</p> <p>19 untouched, largely untouched, would</p> <p>20 the major political concern that</p> <p>21 remains be making CD 1 not</p> <p>22 Republican leading?</p> <p>23 A. It's in the eye of the</p> <p>24 beholder. I mean it's a -- well,</p> <p>25 that's a policy decision to be made</p>	<p style="text-align: right;">Page 341</p> <p>1 TERRENI</p> <p>2 identification, as of this date.)</p> <p>3 Q. Beginning at line 3.</p> <p>4 A. I'm sorry, Ms. Aden, could</p> <p>5 you identify what hearing is this?</p> <p>6 Q. This is the January 13,</p> <p>7 2022, Senate redistricting hearing.</p> <p>8 A. The subcommittee?</p> <p>9 Q. Yes.</p> <p>10 A. And where did you want me</p> <p>11 to go?</p> <p>12 Q. To page 18, line 3. 18 in</p> <p>13 the top right-hand corner, it's</p> <p>14 South Carolina NAACP CD 19952.</p> <p>15 A. Okay.</p> <p>16 Q. Were you present at this</p> <p>17 hearing?</p> <p>18 A. I believe I was, yes.</p> <p>19 Q. And you identified</p> <p>20 Mr. Opperman earlier as someone who</p> <p>21 worked with Senator Harpootlian, is</p> <p>22 that fair?</p> <p>23 A. Yes. I want to say that he</p> <p>24 may have worked with some other</p> <p>25 folks too. I'm not being cute, I</p>

86 (Pages 338 - 341)

<p style="text-align: right;">Page 362</p> <p>1 TERRENI</p> <p>2 Q. Yes. And is that South</p> <p>3 Carolina Senate 3260 to 326 --</p> <p>4 A. I have to 368, yes, yes,</p> <p>5 I'm sorry. It begins with 60 and</p> <p>6 ends with 68.</p> <p>7 (Plaintiffs' Exhibit 23, Email</p> <p>8 from Will Roberts to Mr. Opperman,</p> <p>9 Bates South Carolina Senate 3260 to</p> <p>10 3268, marked for identification, as</p> <p>11 of this date.)</p> <p>12 Q. And this is from Will</p> <p>13 Roberts to Mr. Opperman copying Andy</p> <p>14 Fiffick. You are not copied on this</p> <p>15 email; is that correct?</p> <p>16 A. I don't appear to be, no.</p> <p>17 Q. Do you recall seeing this?</p> <p>18 A. As I said before, I was</p> <p>19 aware that Will ran these reports</p> <p>20 and I think I saw these reports,</p> <p>21 yeah.</p> <p>22 Q. If you can go to 3264,</p> <p>23 which is pdf pages 5 of 9, there's</p> <p>24 an analysis of each of the districts</p> <p>25 and the share, the total number of</p>	<p style="text-align: right;">Page 364</p> <p>1 TERRENI</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. On January 19, 2022, the</p> <p>4 full Senate Judiciary Committee held</p> <p>5 a hearing on congressional</p> <p>6 redistricting. I want to ask you to</p> <p>7 look at tab 25, which is an email</p> <p>8 from Will Roberts to Andy Fiffick</p> <p>9 dated January 16, 2022. This will</p> <p>10 be Plaintiffs' Exhibit 24. And the</p> <p>11 subject is analysis for Senator</p> <p>12 Campsen with an attachment that says</p> <p>13 notes on Senate Amendment 1.</p> <p>14 (Plaintiffs' Exhibit 24, Email</p> <p>15 from Will Roberts to Andy Fiffick,</p> <p>16 marked for identification, as of</p> <p>17 this date.)</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall this email</p> <p>20 and attached analysis?</p> <p>21 A. No.</p> <p>22 Q. Would an analysis such as</p> <p>23 this where it appears that or would</p> <p>24 you agree that Will Roberts appears</p> <p>25 to have done an analysis of whether</p>
<p style="text-align: right;">Page 363</p> <p>1 TERRENI</p> <p>2 voters and the share of voters for</p> <p>3 Biden as compared to Trump. Would</p> <p>4 you agree?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Were these types of</p> <p>7 analysis done, these particular ones</p> <p>8 about the vote shares in each of</p> <p>9 these districts, do you remember</p> <p>10 this one done for Senate Amendment</p> <p>11 1?</p> <p>12 A. I believe so, yes.</p> <p>13 Q. Do you know if it was done</p> <p>14 for the initial staff plan?</p> <p>15 A. Probably.</p> <p>16 Q. And do you know. Well,</p> <p>17 strike that.</p> <p>18 A. It may not have been</p> <p>19 printed but we looked at partisan</p> <p>20 numbers. Specifically these 2020</p> <p>21 Trump/Biden numbers.</p> <p>22 Q. And who gave you those</p> <p>23 numbers or that data to do those</p> <p>24 numbers, is this Vincent, Clark</p> <p>25 Vincent data?</p>	<p style="text-align: right;">Page 365</p> <p>1 TERRENI</p> <p>2 Senate Amendment 1 complies with one</p> <p>3 person one vote, if you look at</p> <p>4 22529?</p> <p>5 A. Yeah.</p> <p>6 Q. And whether it adheres to</p> <p>7 the Voting Rights Act?</p> <p>8 A. Appears that he did that.</p> <p>9 Q. And whether it avoids</p> <p>10 racial gerrymandering?</p> <p>11 A. He says he did.</p> <p>12 Q. And whether it respects</p> <p>13 contiguity or achieves contiguity</p> <p>14 among districts?</p> <p>15 A. Yes.</p> <p>16 Q. 22560 is talking about</p> <p>17 contiguity?</p> <p>18 A. Yes.</p> <p>19 Q. And it does an analysis of</p> <p>20 communities of interest also on</p> <p>21 22530?</p> <p>22 A. Yes.</p> <p>23 Q. And it also looked at cores</p> <p>24 of existing districts on 22530?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 398</p> <p>1 TERRENI</p> <p>2 Q. Mr. Terreni, I'd like to</p> <p>3 get a little more clarity on your</p> <p>4 role in the redistricting process.</p> <p>5 Did you draw any redistricting maps?</p> <p>6 A. No.</p> <p>7 Q. Did you draw any</p> <p>8 redistricting lines?</p> <p>9 A. No.</p> <p>10 Q. Did you dictate the drawing</p> <p>11 of any maps or lines?</p> <p>12 A. No.</p> <p>13 Q. So today if you testified</p> <p>14 that "we" drew a plan, did you</p> <p>15 meaning to include yourself in the</p> <p>16 "we" who drew the plan?</p> <p>17 A. Not in the sense of drawing</p> <p>18 it. And if I said that, I was being</p> <p>19 inartful and I appreciate you</p> <p>20 pointing it out, Mr. Gore.</p> <p>21 Q. So what did you mean by</p> <p>22 that?</p> <p>23 A. What I meant was the Senate</p> <p>24 redistricting staff and specifically</p> <p>25 the members -- and the members of</p>	<p style="text-align: right;">Page 400</p> <p>1 TERRENI</p> <p>2 A. Yes, sir.</p> <p>3 Q. This is the 2021 policy for</p> <p>4 public plan submissions. Do you</p> <p>5 recall discussing this with Ms. Aden</p> <p>6 today?</p> <p>7 A. I do.</p> <p>8 Q. Paragraph 2 of this</p> <p>9 document, the first sentence of that</p> <p>10 paragraph reads: "The redistricting</p> <p>11 subcommittee will designate a time</p> <p>12 period during which it will accept</p> <p>13 redistricting plans for review and</p> <p>14 consideration."</p> <p>15 Did I read that correctly?</p> <p>16 A. You did.</p> <p>17 Q. Did the subcommittee</p> <p>18 designate a time period for</p> <p>19 accepting plan submissions?</p> <p>20 A. It did.</p> <p>21 Q. Were any of the plans</p> <p>22 emailed by the National Republican</p> <p>23 Redistricting Trust provided before</p> <p>24 that deadline?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 399</p> <p>1 TERRENI</p> <p>2 the Senate drew a plan. Some</p> <p>3 members of the Senate came in and</p> <p>4 said I want to see this or that done</p> <p>5 and I would like that include in the</p> <p>6 amendment and ultimately -- well,</p> <p>7 ultimately it's the senator and</p> <p>8 Senate that draws the plan, it's not</p> <p>9 staff, but the staff can certainly</p> <p>10 go through the mechanics of it, the</p> <p>11 staff drew a staff plan.</p> <p>12 Did I draw it specifically,</p> <p>13 no. Was I present while it was</p> <p>14 being drawn, yes. Did I facilitate</p> <p>15 the process, yes. Did I dictate</p> <p>16 where a line went or not, no. Did I</p> <p>17 convey some institutional knowledge</p> <p>18 about the preferences of different</p> <p>19 members or the congressional</p> <p>20 delegation, yes.</p> <p>21 Q. Who is the decision-maker</p> <p>22 as to which plan would be enacted?</p> <p>23 A. The Senate.</p> <p>24 Q. Mr. Terreni, can you open</p> <p>25 tab 1, Plaintiffs' Exhibit 7?</p>	<p style="text-align: right;">Page 401</p> <p>1 TERRENI</p> <p>2 Q. Is that the reason why</p> <p>3 those plans were not posted on the</p> <p>4 website?</p> <p>5 A. Yes. I mean that's --</p> <p>6 yeah. I mean they were sent to us</p> <p>7 at the last minute, we looked at</p> <p>8 them. There wasn't a subcommittee</p> <p>9 hearing for anybody to comment on.</p> <p>10 We didn't use them, we didn't</p> <p>11 consider them and so we didn't post</p> <p>12 them. I'm not sure a lot of thought</p> <p>13 was given it to, Mr. Gore.</p> <p>14 Q. Let me point your attention</p> <p>15 to paragraph I-B. And the first</p> <p>16 part of I-B reads: "All plans</p> <p>17 submitted to and accepted by the</p> <p>18 redistricting subcommittee will be</p> <p>19 made part of the public record and</p> <p>20 will be made available in the same</p> <p>21 manner as other redistricting</p> <p>22 subcommittee public records."</p> <p>23 Did I read that correctly?</p> <p>24 A. You did.</p> <p>25 Q. Were the National</p>

<p style="text-align: right;">Page 402</p> <p>1 TERRENI</p> <p>2 Republican Redistricting Trust plans</p> <p>3 ever accepted by the redistricting</p> <p>4 subcommittee within the meaning of</p> <p>5 this document?</p> <p>6 A. No, sir.</p> <p>7 Q. Why not?</p> <p>8 A. Because they were never</p> <p>9 accepted and brought before the</p> <p>10 subcommittee for public testimony</p> <p>11 and for questions by the members of</p> <p>12 the subcommittee. They were not</p> <p>13 presented to the subcommittee.</p> <p>14 Q. Do you know whether any</p> <p>15 member of the subcommittee or any</p> <p>16 member of the Senate ever saw those</p> <p>17 plans?</p> <p>18 A. Before or after the</p> <p>19 subcommittee?</p> <p>20 Q. Either.</p> <p>21 A. Before no. Afterwards upon</p> <p>22 request I believe Senator</p> <p>23 Harpootlian saw them. I don't</p> <p>24 believe anybody else wanted to see</p> <p>25 them.</p>	<p style="text-align: right;">Page 404</p> <p>1 TERRENI</p> <p>2 defendants, committee members or the</p> <p>3 South Carolina General Assembly or</p> <p>4 communications between you and</p> <p>5 defendants committee members or the</p> <p>6 South Carolina General Assembly."</p> <p>7 Did you ever provide your</p> <p>8 handwritten documents to defendants,</p> <p>9 committee members or the South</p> <p>10 Carolina General Assembly?</p> <p>11 A. No, sir.</p> <p>12 Q. Were your handwritten notes</p> <p>13 communications between you and</p> <p>14 defendants, committee members or the</p> <p>15 South Carolina General Assembly?</p> <p>16 A. No.</p> <p>17 Q. Would you scroll down to</p> <p>18 the next page, page 12 of the</p> <p>19 document, page 15 of the pdf.</p> <p>20 A. Yes, sir.</p> <p>21 Q. Request For Production 2</p> <p>22 calls for "all correspondence and</p> <p>23 documents you received from Mr. Adam</p> <p>24 Kincaid, the National Republican</p> <p>25 Redistricting Trust, Fair Alliance</p>
<p style="text-align: right;">Page 403</p> <p>1 TERRENI</p> <p>2 Q. Did it violate any Senate</p> <p>3 redistricting subcommittee policy or</p> <p>4 this document for you and others to</p> <p>5 look at the National Republican</p> <p>6 Redistricting Trust plans?</p> <p>7 A. No, sir.</p> <p>8 Q. Mr. Terreni, can you turn</p> <p>9 to tab 45, Plaintiffs' Exhibit 11?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Is this the subpoena that</p> <p>12 was served on you in this case?</p> <p>13 A. Yes.</p> <p>14 Q. And do you recall earlier</p> <p>15 today discussing with Ms. Aden some</p> <p>16 handwritten notes you took of public</p> <p>17 hearings in 2021?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Can you scroll down to page</p> <p>20 11 of this exhibit?</p> <p>21 A. Yes, sir.</p> <p>22 Q. This is Request For</p> <p>23 Production No. 1 towards the bottom</p> <p>24 of the page. Calls for "all</p> <p>25 documents you provided to</p>	<p style="text-align: right;">Page 405</p> <p>1 TERRENI</p> <p>2 America, Magellan Consulting or</p> <p>3 anyone else."</p> <p>4 Were your handwritten notes --</p> <p>5 did I read that correctly?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Were your handwritten</p> <p>8 notes, correspondence or documents</p> <p>9 you received from Mr. Kincaid, the</p> <p>10 National Republican Redistricting</p> <p>11 Trust, Fair Alliance America,</p> <p>12 Magellan Consulting or anyone else?</p> <p>13 A. No, sir.</p> <p>14 Q. Scroll down to Request For</p> <p>15 Production No. 3. This one asks</p> <p>16 again for "all documents you</p> <p>17 provided to or received from</p> <p>18 defendants, committee members or the</p> <p>19 South Carolina General Assembly and</p> <p>20 communications between you and</p> <p>21 defendants, committee members or the</p> <p>22 South Carolina General Assembly</p> <p>23 relating to the following hearings."</p> <p>24 Did I read that correctly?</p> <p>25 A. You did.</p>